

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND VIRGINIA

ROBERT DAVID STEELE,

Plaintiff,

17-CV-00601-MHL

-against-

JASON GOODMAN,

Defendant.

NOTICE OF AMENDED MOTION, AMENDED MOTION TO INTERVENE, MEMORANDUM OF LAW AND ARGUMENT

NOTICE OF AMENDED MOTION TO INTERVENE

<u>AND</u>

CERTIFICATE OF SERVICE

- 1. NOTICE SHOULD BE TAKEN BY THE CLERK OF THE COURT AND ALL PARTIES that the interested party known as D. GEORGE SWEIGERT is seeking the LEAVE OF THE COURT TO INTERVENE into this instant lawsuit pursuant to Fed. R. Civ. Proc. Rule 24(a) and Virginia Supreme Court Rule 3:14. (Rule 3:14 provides that "[a] new party may by leave of court file a pleading to intervene as a plaintiff or defendant to assert any claim or defense germane to the subject matter of the proceeding.").
- 2. The documents accompanying this NOTICE comport to the 2009 Revisions of Fed. R. Civ. Proc. Rule 15(a).
- 3. As no discovery has taken place and this instant lawsuit is in the pleading stages, the Court will note (as described in the accompanying pleadings) that this is a TIMELY motion.
- 4. The interested party (intervenor-applicant) D. George Sweigert purposes to intervene as a **PLAINTIFF**. As sworn below, the interested party has an interest in these proceedings and

brings identical as the Plaintiff (Robert David Steele) to this Court. Sweigert maintains an interest in the outcome of these proceedings as described in the accompanying documents.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this day of March, 2019.

D. George Sweigert

D. GEORGE SWEIGERT, C/O P.O. BOX 152 MESA, AZ 85211

It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

Steven Scott Biss 300 West Main St Ste 102

Charlottesville, VA 22903

Jason Goodman 252 7th Avenue New York, NY 10001 Richard Johan Conrod, Jr. Kaufman & Canoles PC 150 W Main St PO Box 3037 Norfolk, VA 23510

Clerk of the Court **U.S. District Court** 701 E. Broad St. Richmond, VA 23219

Terry Catherine Frank Kaufman & Canoles PC 1021 E Cary St, Suite 1400 Two James Center PO Box 27828 Richmond, VA 23219

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this **2**// day of March, 2019.

D. George Sweigert